



243083

Five-Year Review Report
Third Five-Year Review Report
for

NL Industries/Taracorp/Golden Auto

City of St. Louis Park

Hennepin County, Minnesota

March 2005

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3/31/05

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List of Acronyms

ACLs	Alternate Concentration Levels
AMR	Annual Monitoring Report
AOC	Administrative Order by Consent
ARARs	Applicable or Relevant and Appropriate Requirements
BNR	Burlington Northern Railroad
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CFR	Code of Federal Regulations
COC	Contaminant of Concern
CTF	Containment and Treatment Facility
EPA	United States Environmental Protection Agency
HRL	Health Risk Level
IC	Institutional Control
LMCLs	Listed Maximum Concentration Levels
MCES	Metropolitan Council Environmental Services
MCLs	Maximum Contaminant Levels
MDH	Minnesota Department of Health
MERLA	Minnesota Environmental Liability and Response Act
MPCA	Minnesota Pollution Control Agency
MWW	Minneapolis Water Works
NCP	National Oil and Hazardous Substances Contingency Plan
NIROP	Naval Industrial Reserve Ordnance Plant
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
O&M	Operation and Maintenance
OSHA	Occupational Safety and Health Administration
OU	Operable Unit
PLP	Permanent List of Priorities
POTW	Publicly Owned Treatment Works
PRP	Potentially Responsible Party
RA	Remedial Action
RAGS	Risk Assessment Guidance for Superfund
RAL	Recommended Allowable Limit
RAO	Remedial Action Objective
RCRA	Resource Conservation and Recovery Act
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
SARA	Superfund Amendments and Reauthorization Act of 1986
SDWA	Safe Drinking Water Act
TBCs	To be Considereds
TCE	Trichloroethylene
VOCs	Volatile Organic Compounds
WasteLAN	The Regional database related to CERCLIS

Executive Summary

The remedial action plan for the NL Industries/Taracorp/Golden Auto Site located in St. Louis Park, Minnesota, included installing an asphalt cap over most of the site, long-term ground water monitoring, additional off-site soil assessment and, if necessary, a feasibility study to determine the response action.

The on-site investigation and remedial actions were performed between 1985 and 1988 and were completed in June 1988 with the placement of an asphalt cap. In 1991, the asphalt cap was slightly modified to enhance the use of the area as a parking lot. Soil removed from fence post borings, light pole borings and from the access drive entrances was placed in mounds around the perimeter of the parking lot and covered by asphalt. Routine monitoring and maintenance of the asphalt cap are performed with the submittal of an annual report to the MPCA. The area with the asphalt cap is currently used as a parking lot.

Ground water monitoring was performed at monitoring wells through the mid-1990's. Low concentrations of the contaminants of concern were detected in select monitoring wells. NL Industries requested approval to discontinue ground water monitoring. Approval was granted and the on-site monitoring wells were permanently sealed in May 2001.

The off-site soil investigation completed by NL Industries and the Endangerment Assessment performed by EPA determined that off-site soil remedial actions were not necessary. Based on the available data, a ROD was signed on September 23, 1988 which declared no further action as the selected remedy for off-site soils.

The remedy is functioning as intended and is protective of human health and the environment in the short-term. Long-term protectiveness will be achieved once the follow-up actions and recommendations are completed.

Five-Year Review Summary Form

SITE IDENTIFICATION		
Site name (from WasteLAN): NL Industries/Taracorp/Golden Auto		
EPA ID (from WasteLAN): MND097891634		
Region: 5	State: MN	City/County: City of St. Louis Park / Hennepin County
SITE STATUS		
NPL status: Final		
Remediation status (choose all that apply): Operating		
Multiple OUs? No	Construction completion date: 9 / 27 / 1995	
Has site been put into reuse? Yes		
REVIEW STATUS		
Lead agency: State		
Author name: Steve Schoff		
Author title: Project Manager	Author affiliation: MN Pollution Control Agency	
Review period: 10 / 2004 through 3 / 2005		
Date(s) of site inspection: 11 / 12 / 2004		
Type of review: Statutory		
Review number: 3 (third)		
Triggering action: Previous Five-Year Review Report		
Triggering action date (from WasteLAN): 3 / 22 / 2000		
Due date (five years after triggering action date): 3 / 22 / 2005		

Five-Year Review Summary Form, cont'd.

Issues:

1. The cap needs to be maintained to ensure the protectiveness of the remedy.
2. Redevelopment of the property may affect protectiveness of the remedy.
3. Institutional controls have not been implemented to ensure the long-term protectiveness of the remedy.

Recommendations and Follow-up Actions:

1. The existing cap needs to be inspected annually and maintained on an as needed basis, with the submittal of annual reports to the MPCA for review and approval.
2. Redevelopment actions for the property must be performed based on the approval of the MPCA VIC and Superfund Programs and must ensure the protectiveness of the remedy.
3. Need to implement the institutional controls and finalize the plan for long-term monitoring of the cap.

Protectiveness Statement(s):

The remedy is functioning as intended and is protective of human health and the environment in the short-term. Long-term protectiveness will be achieved once the follow-up actions and recommendations are completed.

Other Comments:

None

FIVE-YEAR REVIEW REPORT

**NL Industries/Taracorp/ Golden Auto
St. Louis Park, Minnesota**

I. INTRODUCTION

The purpose of the Five-Year Review is to determine whether the remedy at the NL Industries/Taracorp/Golden Auto Site is protective of human health and the environment. The methods, findings and conclusions of reviews are documented in Five-Year Review reports. In addition, Five-Year Review reports identify issues during the review, if any, and identify recommendations to address them.

The Agency is preparing this Five-Year Review report pursuant to CERCLA Section 121 and the National Contingency Plan (NCP). CERCLA Section 121 states:

If the President selects a remedial action that results in any hazardous substances, pollutants, or contaminants remaining at the site, the President shall review such remedial action no less often than each five years after the initiation of such remedial action to ensure that human health and the environment are being protected by the remedial action being implemented. In addition, if upon such review it is the judgement of the President that action is appropriate at such site in accordance with section [104] or [106], the President shall take or require such action. The President shall report to the Congress a list of facilities for which such review is required, the results of all such reviews, and any actions taken as a result of such actions.

The Agency interpreted this requirement further in the NCP; 40 CFR Section 300.430(f)(4)(ii) states:

If a remedial action is selected that results in hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure, the lead agency shall review such action no less often than every five years after initiation of the selected remedial action.

The Minnesota Pollution Control Agency (MPCA) staff has completed a Five-Year Review of the Remedial Actions (RAs) conducted at the NL Industries/Taracorp/Golden Auto Site in St. Louis Park, Minnesota. This Five-Year Review evaluates whether the RA remains protective of public health, welfare, and the environment and was conducted from November 2004 through March 2005.

This third review focuses on the protectiveness of the NL Industries/Taracorp/Golden Auto Site's RA, sixteen years from the time the RA commenced. This is the third Five-

Year Review completed by the MPCA. The first Five-Year Review was completed during March 1995 and the second review was completed on March 22, 2000.

II. SITE CHRONOLOGY

Table 1: Chronology of Site Events

Date	Event
9/1983	Site was placed on the National Priorities List (NPL).
1/1984	MPCA issued a Request for Response Action (RFRA) to NL Industries, Taracorp and Golden Auto.
10/1984	Site was placed on the Permanent List of Priorities (PLP).
1985	NL Industries entered into an Administrative Order and Response Order by Consent (Consent Order).
1985 – 1988	Initial investigations and remedial actions.
6/30/1988	Remedial action completion.
9/23/1988	Record of Decision (ROD) was signed.
3/1995	Completion of first Five-Year Review
5/21/1998	Site was deleted from the NPL.
12/24/1998	Site was removed from the PLP.
3/2000	Completion of the second Five-Year Review.
5/2001	Monitoring wells were permanently sealed.
Ongoing	Annual review of the asphalt cap and response actions.

III. BACKGROUND

Physical Characteristics

The NL Industries/Taracorp/Golden Auto Site (Site) originally consisted of two contiguous properties which are located in St. Louis Park, Hennepin County, Minnesota (Figure 1). One property was formerly owned by NL Industries and Taracorp and was located at 3645 Hampshire Avenue South. The second property was owned by Mr. Golden and was located at 7003 West Lake Street. Mr. Golden currently owns both properties. A majority of the Site is paved with asphalt and is leased by Methodist Hospital for parking. A pawn shop and an auto impound lot for the City of St. Louis Park also lease a portion of the Site.

Adjacent Land and Resource Use

The Site is bounded on the east and southeast by a former railroad track which is currently a bicycle and hiking trail that is maintained by Hennepin County. There are residential areas located further to the east and southeast of the former railroad tracks. To the south and west are commercial and light industrial properties including a Sam's Club. To the north is an electrical substation, Lake Street and further to the north is Highway 7.

The former Reilly Tar and Chemical Site is located less than ½ mile northwest of the Site. Minnehaha Creek is located about ½ mile to the south and the Mississippi River is approximately six miles east of the Site.

History of Contamination

The NL Industries/Taracorp/Golden Auto Site was the location of a secondary lead smelter from 1940 to 1982. The secondary lead smelting operations recovered lead from lead plates, battery fragments and lead containers. A blast furnace was used until 1960, when it was replaced with a reverberatory smelting furnace. Industrial operations and on-site waste disposal conducted from 1940 until 1982 resulted in elevated lead levels in air and in on-site soil and were suspected of causing elevated lead levels in ground water and in off-site soils.

Initial Response

The Site was placed on the NPL in September 1983. The MPCA issued a Request for Response Action (RFRA) to NL Industries in January 1984. In 1985, NL Industries entered into a Consent Order with the MPCA and EPA. The Consent Order covered three areas as follows:

- On-site soils investigation, stabilization and cleanup;
- Ground water investigation and long-term ground water monitoring; and
- An off-site soil remedial investigation and, if necessary, a feasibility study for remedial action.

The on-site investigation and remedial actions were performed between 1985 and 1988 and were completed in June 1988 with the placement of an asphalt cap. In 1991, the asphalt cap was slightly modified to enhance the use of the area as a parking lot. Soil removed from fence post borings, light pole borings and from the access drive entrances was placed in mounds around the perimeter of the parking lot and covered by asphalt.

NL Industries investigated the ground water quality beneath the Site by utilizing 13 monitoring wells that were installed at varying depths in the surficial glacial deposits. Low concentrations of the contaminants of concern (COCs) were detected in ground water. The assessment indicated the surficial deposits consist of thin layers of sand and fill which overlie a peat layer. The underlying Quaternary glacial deposits vary from 30 to 100 feet thick and consist of a mixture of sand, silt and clay. The ground water elevation data indicated the ground water flow in the glacial deposits was from west to east. The glacial deposits are underlain by bedrock aquifers including the Platteville Formation, the St. Peter Sandstone, the Prairie du Chien Group, and the Jordan Formation.

As part of the Consent Order, NL Industries was required to investigate off-site soils in the vicinity of the Site and, if necessary, prepare a Response Action Plan to conduct response actions for contaminated surface soils. The Consent Order prescribed that NL

Industries would conduct a phased investigation. The first phase involved soil sampling in the nearest prominent downwind residential areas defined as Zone I. If soil levels were greater than 750 parts per million (ppm) for any residence on the outer (east) edge of Zone I, NL Industries would be required to conduct Phase 2 of the soil sampling in a larger area designated as Zone II. In addition, NL Industries would be required to conduct a Feasibility Study (FS) to examine cleanup options if the Zone I and/or Zone II soils were equal to or greater than 750 ppm and clearly attributable to the secondary lead smelter. NL Industries completed the Phase I off-site soil investigation in 1987. Based on the Zone I sampling results, NL Industries recommended to the MPCA and the EPA that sampling in Zone II and an FS were not necessary.

Before accepting NL Industries' recommendation, EPA developed its own risk assessment for the off-site soil in Zone I. EPA conducted its own risk assessment, called an Endangerment Assessment, because the appropriate risk assessment methodology for estimating public health impacts was developed after the Consent Order was signed. The Endangerment Assessment concluded the Zone I soil lead levels did not present an imminent public health threat because the concentrations did not exceed the 500 to 1000 milligram per kilogram (mg/kg) soil lead guideline.

Basis For Taking Action

Hazardous substances that have been detected in each medium include:

Soil

Lead
Arsenic
Cadmium

Ground Water

Lead
Arsenic
Cadmium

IV. REMEDIAL ACTIONS

Remedy Selection

The 1985 Consent Order covered three areas as follows:

- On-site soils investigation, stabilization and cleanup;
- Ground water investigation and long-term ground water monitoring; and
- An off-site soil remedial investigation and, if necessary, a feasibility study for remedial action.

The on-site investigation and remedial actions were performed between 1985 and 1988 and were completed in June 1988 with the placement of an asphalt cap.

Ground water monitoring detected low concentrations of the contaminants of concern. In November 1987, NL Industries, MPCA and EPA agreed to a 30-year ground water monitoring program.

The off-site soil investigation completed by NL Industries and the Endangerment Assessment performed by EPA determined that off-site soil remedial actions were not necessary. Based on the available data, a ROD was signed on September 23, 1988 which declared no further action as the selected remedy for off-site soils.

ARAR Review

As stated above, the Five-Year Review is being conducted to determine whether the NL Industries/Taracorp/Golden Site RA remains protective of public health and the environment. The more specific purpose of the reviews is two-fold: (1) to confirm that the remedy as spelled out in the ROD and/or remedial design remains effective at protecting human health and the environment, (e.g., the remedy is operating and functioning as designed) and institutional controls are in place and are protective and (2) to evaluate whether original cleanup levels remain protective of human health and the environment. ARARs and "To Be Considereds" (TBCs) are key elements in fulfilling these two purposes. The clean-up levels at this site remain protective of human health and the environment.

Remedy Implementation

The on-site soil investigation and remedial actions were performed between 1985 and 1988 and were completed in June 1988 with the placement of an asphalt cap. An annual inspection of the asphalt cap is performed and maintenance is completed as needed. An annual report documenting the findings and the ongoing maintenance is submitted to the MPCA for review.

The off-site assessment and risk assessment determined that off-site soil remedial actions were not necessary. On September 23, 1988, a ROD was signed which documented a no further action remedy for off-site soils.

A neighborhood organization hired a consultant in 1996 to sample surficial soil in the vicinity of the Site in an attempt to quantify their concerns regarding potential risks posed by historical emissions from the lead smelter. Soil samples were collected from residential properties in 1997 and analyzed for lead. The analytical data indicated that some properties contained soil lead concentrations greater than 300 mg/kg. As a result, the neighborhood organization, in an agreement with the City of St. Louis Park, arranged to have the topsoil at some properties removed and replaced and also arranged to have some alleys paved with concrete.

NL Industries investigated the ground water quality beneath the Site. Low concentrations of the COCs were detected in the ground water. In November 1987, NL Industries, MPCA and EPA agreed to a 30-year ground water monitoring program. However, based

during the late 1990's and the MPCA and EPA approved the abandonment of the monitoring wells. The on-site monitoring wells were permanently sealed in May 2001.

The Site was deleted from the NPL on May 21, 1998 and was removed from the PLP on December 24, 1998.

System Operation and Maintenance

NL Industries is responsible for performing ongoing monitoring and maintenance of the integrity of the asphalt cap. The primary activities include the following:

- Annual inspection of the asphalt cap;
- Routine maintenance of the asphalt cap as required by site specific conditions; and
- Submittal of an annual monitoring report to the MPCA.

V. PROGRESS SINCE THE LAST REVIEW

The last Five-Year Review, completed in 2000, contained several recommendations that are summarized as follows:

- Due to the presence of slag and ash in the subsurface, continued inspections and maintenance of the asphalt cap are recommended; and
- Continued long-term ground water monitoring is not warranted as long as the cap is maintained. MPCA staff has recently recommended to U.S. EPA that the collection of ground water samples is not necessary.

The asphalt cap is inspected annually and maintenance is performed as needed. NL Industries is ultimately responsible for maintaining the asphalt cap; however, the inspections and maintenance are currently performed by Methodist Hospital because they are leasing the paved portions of the site for parking. The findings are presented to the MPCA in an annual report.

In an August 1999 letter, EPA concurred with the MPCA recommendation to discontinue ground water monitoring. On June 21, 2000 an amendment to the Consent Order was approved by EPA, MPCA and NL Industries. The purpose of the amendment was to discontinue long-term ground water monitoring. The on-site monitoring wells were permanently sealed during May 2001.

VI. FIVE-YEAR REVIEW PROCESS

Administrative Components

The Five-Year Review was initiated on October 8, 2004. The NL Industries representative was notified of the initiation of the Five-Year Review during January 2005. The review components included:

- Community Involvement;
- Document Review;
- Data Review;
- Site Inspection;
- Local Interviews: and
- Five-Year Review Report Development and Review.

Community Involvement

A representative of NL Industries was notified by a telephone interview that a Five-Year Review was being performed.

On February 16, 2005 a notice was published in the Star Tribune newspaper announcing that a Five-Year Review was being conducted for the NL Industries/Taracorp/Golden Auto Site.

Document Review

This Five-Year Review consisted of a review of relevant documents including the Consent Order, the ROD, assessment reports, annual monitoring reports (AMRs), MPCA staff response letters and the previous Five-Year Review reports. A list of the documents reviewed is presented in the Bibliography.

Data Review

Monitoring wells P-117, P-118, P-119, W-1, W-2, W-3, W-11, W-17, MW-1, MW-2, MW-3, NL-1, NL-2 and NL-3R were permanently sealed on May 25, 2001. The only remaining well that was used in the monitoring network for the Site is W-9. Monitoring well W-9 was not sealed because it is part of the ground water monitoring network for the adjacent Reilly Tar and Chemical Site.

Current tasks associated with the remedy include an annual inspection of the asphalt cap and maintenance as needed.

There is a proposal to redevelop the site. The interested party has entered the proposed project into the MPCA Voluntary Investigation and Cleanup (VIC) Program. The MPCA VIC and Superfund staff are providing oversight of the proposed redevelopment project. The proposed redevelopment will include the demolition of the existing structures and construction of an office/warehouse building(s). The interested party has prepared a work plan for MPCA review to perform additional assessment to further characterize the extent

and magnitude of the contamination and to document site conditions for construction purposes.

Site Visit

A site visit was conducted on November 12, 2004 as part of the Five-Year Review process. The asphalt cap was observed and the visible portions of the asphalt cap appeared to be in good condition. There is a fence around a portion of the Site, although access is not limited because a portion of the property is used as a parking lot and the remainder is used by commercial businesses.

Interviews

Mr. Terry Casey, Director, Environmental Affairs with NL Industries was interviewed on January 13, 2005. Mr. Casey stated the remedy is functioning as intended and NL Industries is not aware of any issues or concerns.

VII. TECHNICAL ASSESSMENT

Question A: Is the remedy functioning as intended by the decision documents?

Yes, the remedy consists of an asphalt cap which has reduced the risk of contaminants leaching to the ground water and has reduced exposure to the remaining soil impacts. Thus, the remedy is functioning as intended.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives (RAOs) used at the time of the remedy selection still valid?

Yes, in November 1987, NL Industries, MPCA and EPA agreed to a 30-year ground water monitoring program. However, the low concentrations of contaminants detected in the ground water resulted in the MPCA and EPA approving discontinuation of the ground water monitoring and abandonment of the monitoring wells.

Question C: Has any other information come to light that could question the protectiveness of the remedy?

There is a proposal to redevelop the property. The developer has entered the MPCA VIC Program and has prepared a work plan to perform additional sampling and analysis prior to developing the property. The proposed redevelopment will include new buildings, covered parking lots and landscaped areas. MPCA will ensure that any actions taken to redevelop the property will minimize exposure to the contaminated soil and will maintain the protectiveness of the remedy.

VIII. ISSUES

Table 3 - Issues

Issue	Currently Affects Protectiveness (Y/N)	Affects Future Protectiveness (Y/N)
1. The cap needs to be maintained to ensure the protectiveness of the remedy.	Y	Y
2. Redevelopment of the property may affect protectiveness of the remedy.	N	Y
3. Institutional controls have not been implemented to ensure the long term protectiveness of the remedy.	N	Y

IX. RECOMMENDATIONS

The remedy is functioning as intended. The following recommendations are:

No	Issue	Recommendations/ Follow-up Actions	Party Responsible	Oversight Agency	Milestone Date	Follow-up Actions: Affects Protectiveness (Y/N)	
						Current	Future
1.	Maintain Cap	The existing cap needs to be inspected annually and maintained on an as needed basis, with the submittal of annual reports to the MPCA for review and approval.	NL Industries	MPCA	Ongoing	Y	Y
2.	Redevelopment	Redevelopment actions for the property must be performed based on the approval of the MPCA VIC and Superfund Programs and must ensure the protectiveness of the remedy.	NL Industries / Developer	MPCA	Ongoing	N	Y
3.	Institutional Controls	Need to implement the institutional controls and finalize the plan for long-term monitoring of the cap.	NL Industries / Developer	MPCA	Dec. 2005	N	Y

X. PROTECTIVENESS STATEMENT

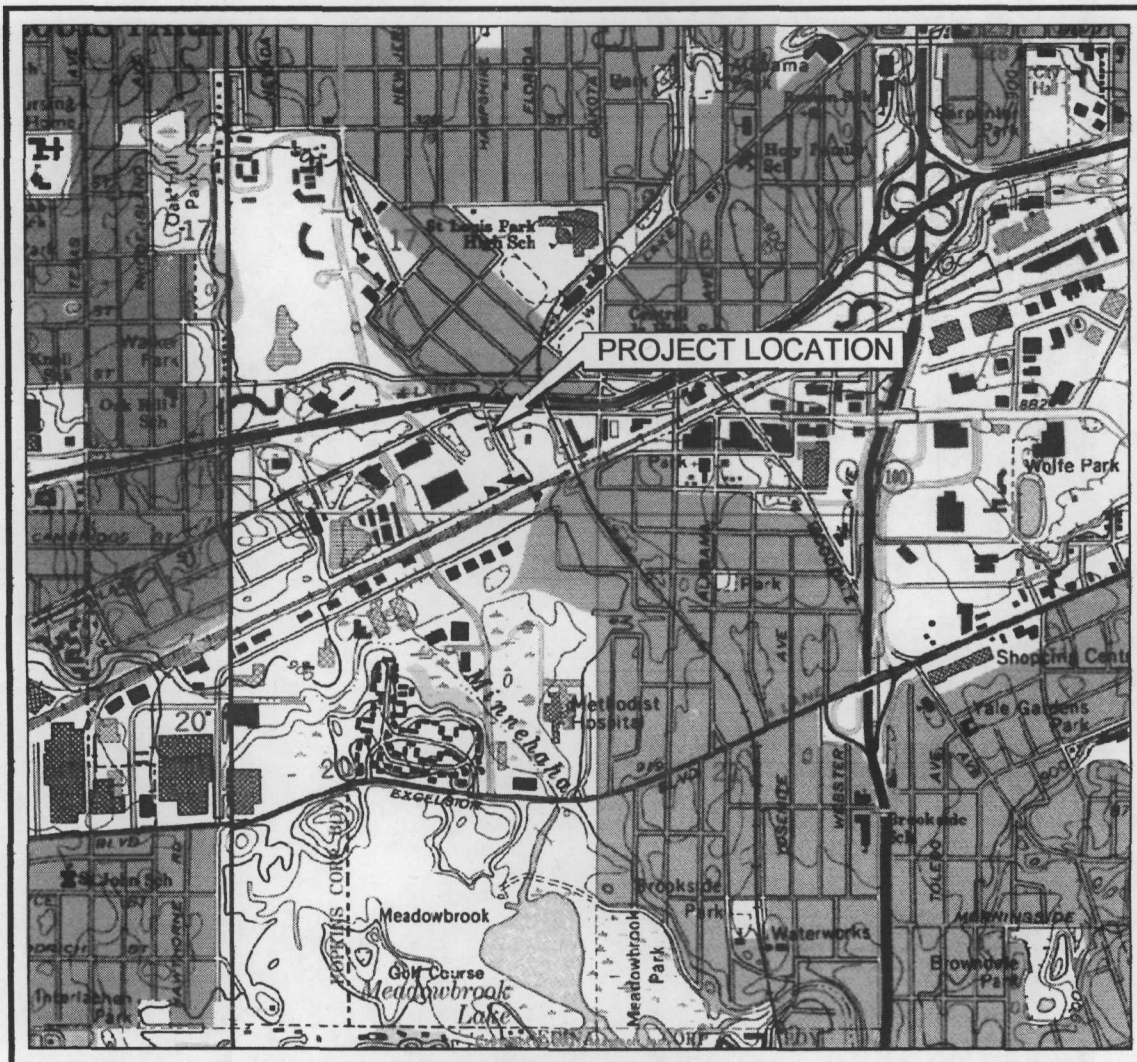
The remedy is functioning as intended and is protective of human health and the environment in the short-term. Long-term protectiveness will be achieved once the follow-up actions and recommendations are completed.

XI. NEXT REVIEW

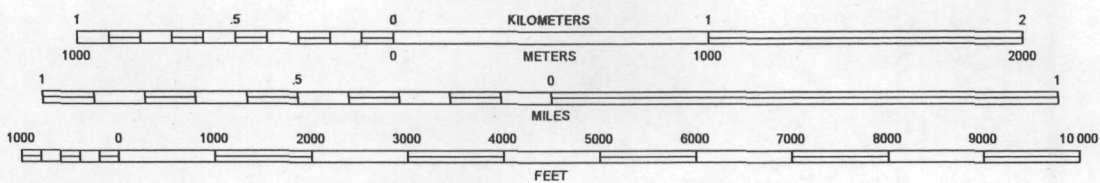
Hazardous substances, pollutants, or contaminants will remain at the NL Industries/Taracorp/Golden Auto Site. However, MPCA staff feels that impending redevelopment will not prevent unlimited use. As a result, redevelopment will dictate cleanup criteria (extent and levels) and will target the planned use of the Site. NL Industries or the developer will finalize and implement the institutional controls and the long-term cap monitoring plan, possibly, obviating the need for further five-year reviews.

APPENDIX A

UNITED STATES - DEPARTMENT OF THE INTERIOR - GEOLOGICAL SURVEY



SCALE 1:24 000



MINEAPOLIS SOUTH QUADRANGLE
MINNESOTA - HENNEPIN COUNTY
7.5 MINUTE SERIES (TOPOGRAPHIC)



DIAGRAM IS FOR GENERAL LOCATION ONLY,
AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

SITE LOCATION MAP
NATIONAL LEAD SITE
7003 WEST LAKE STREET
ST. LOUIS PARK, MN
MPCA

Project Mgr: WJB
Designed By: WJB
Checked By: WJB
Approved By: WJB

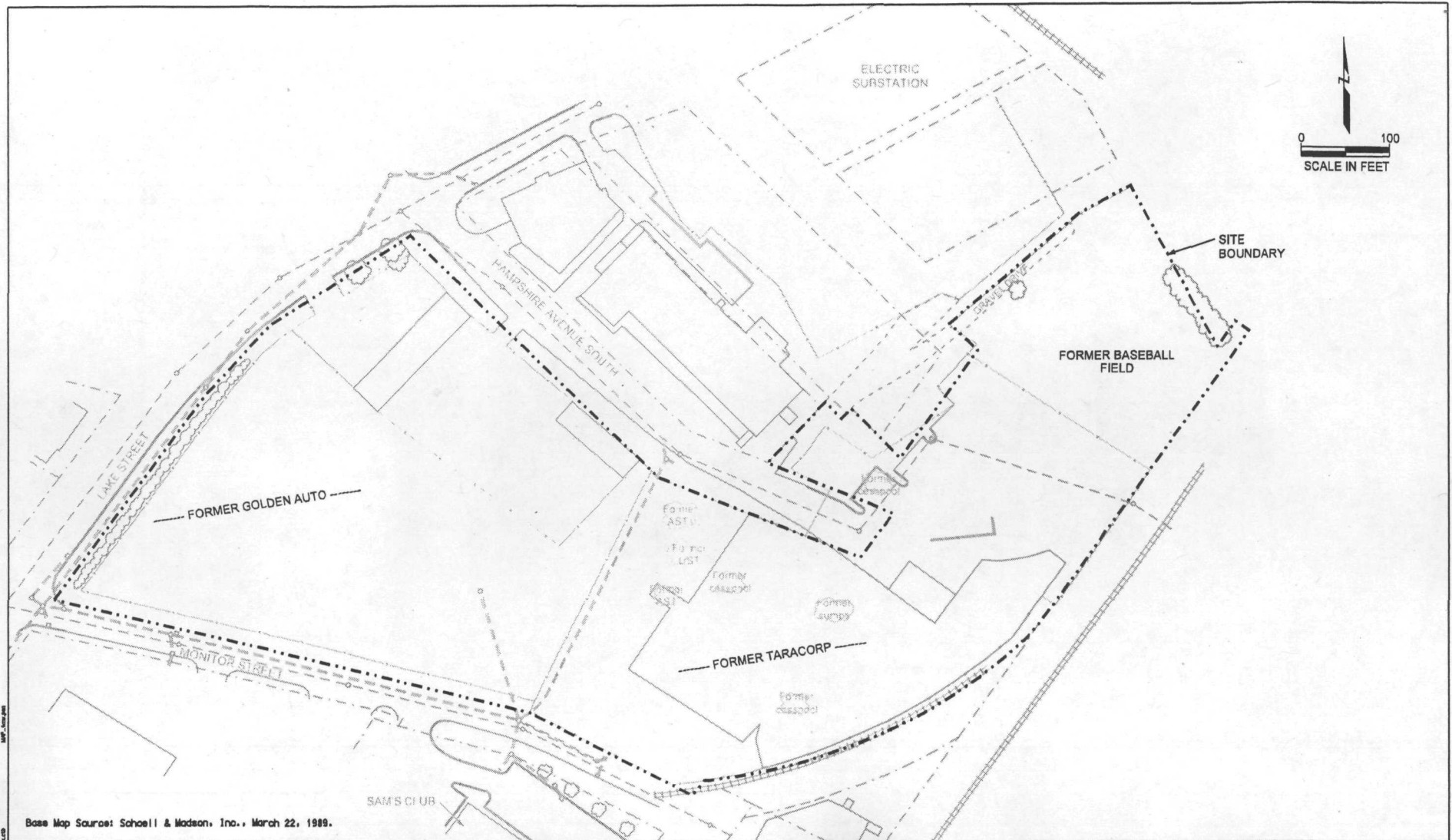
Terracon
3535 Hoffman Road East
White Bear Lake, MN 55110

Project No. 41047062
Scale: AS SHOWN
Date: 2/14/05
Drawn By: CDR (41)

File Name: 41047062sl.dwg

TOPO

Figure No. 1



Base Map Source: Schoell & Madson, Inc., March 22, 1989.

NO.	DATE	REVISION	BY	NO.	DATE	REVISION	BY

Approval: _____
Date: _____

GEOMATRIX
Geomatrix Consultants, Inc.
14525 Highway 7, Suite 104
Minneapolis, MN 55345

SITE MAP
National Lead Site
3645 Hampshire Ave South
St Louis Park, Minnesota

10021
Project No.
2
Figure

9/15/2000 10:14
 S:\0000\10021\10021.dwg
 10/15/2000 10:14

APPENDIX B

Bibliography

Request for Issuance of a Request for Response Action to NL Industries, Inc., Taracorp, Inc., and Golden Auto Parts Company, Inc. Regarding Contamination at and Around the NL/Taracorp/Golden Auto Hazardous Waste Site in St. Louis Park, MPCA, January 10, 1984

Administrative Order and Response Order By Consent, U.S. EPA, February 1985

Record of Decision, September 29, 1988

Site Review and Update for the National Lead/Taracorp/Golden Auto Parts Site, Minnesota Department of Health, May 1994

February 1995, Five-Year Review, NL Industries/Taracorp/Golden Auto Parts Site

August 1999, EPA letter regarding monitoring well abandonment

March 14, 2000, Five-Year Review, NL Industries/Taracorp/Golden Auto Parts Site

October 12, 2000, Pavement Condition Review of the Temporary Parking Lot "Golden Site" (Purple Lot), St. Louis Park, Minnesota, SRF Consulting Group, Inc.

June 1, 2001, Well Abandonment at the NL Industries/Taracorp/Golden Auto Site, Barr Engineering

July 23, 2001, Pavement Condition Review of the Temporary Parking Lot "Golden Site" (Purple Lot), St. Louis Park, Minnesota, SRF Consulting Group, Inc.

September 4, 2002, Pavement Condition Review of the Temporary Parking Lot "Golden Site" (Purple Lot), St. Louis Park, Minnesota, SRF Consulting Group, Inc.

September 30, 2003, Pavement Condition Review of the Temporary Parking Lot "Golden Site" (Purple Lot), St. Louis Park, Minnesota, SRF Consulting Group, Inc.

July 13, 2004, Pavement Condition Review of the Temporary Parking Lot "Golden Site" (Purple Lot), St. Louis Park, Minnesota, SRF Consulting Group, Inc.

November 3, 2004, Work Plan Site Investigation, National Lead Site, 7003 West Lake Street, St. Louis Park, Minnesota, Geomatrix Consultants, Inc.